

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**GDC TECHNIQS, LTD.**  
**Plaintiff,**

**v.**

**JAMES ROGER GRACE and**  
**J.R.G. DESIGN, INC.,**  
**Defendants.**

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**CIVIL ACTION NO. 5:15-CV-00488-RP**

**PLAINTIFF'S RESPONSE IN OPPOSITION TO**  
**OPPOSED SECOND MOTION TO WITHDRAW AS DEFENDANT'S COUNSEL**

GDC Technics, Ltd. f/k/a Gore Design Completions, Ltd. ("GDC Technics, Ltd.") hereby files this Response in Opposition to The Snell Law Firm, P.L.L.C. and Jason W. Snell and John Robert Skrabanek's Opposed Second Motion to Withdraw as Defendant's Counsel ("Motion") [Dkt. #132] and respectfully requests that the Motion be denied.

1. This lawsuit was filed on June 12, 2015. The Snell Law Firm, P.L.L.C. and Jason W. Snell and John Robert Skrabanek have represented the defendants since the inception of the litigation. Trial was set for March 20, 2017. GDC Technics, Ltd.'s claims and causes of action against James Roger Grace were dismissed and the sole Defendant is J.R.G. Design, Inc. in the above-styled and numbered cause.

2. Effective on March 18, 2017, J.R.G. Design, Inc. transferred certain supplemental type certificates ("STC") to GDC Technics, Ltd. or its assigns. As part of the settlement agreement, the parties agreed to abate this case for a period of one hundred twenty days (120). Therefore, this case has been abated until July 18, 2017.

3. J.R.G. Design, Inc., Mr. Grace's company that owns the STC's, cannot appear *pro se*. Mr. Grace claims he cannot pay his current attorney and, therefore, the likelihood of

Mr. Grace being able to pay a different attorney on behalf of his company, J.R.G. Design, Inc., is questionable. This will further prejudice GDC Technics, Ltd. by delaying the resolution of this matter should J.R.G. Design, Inc., not fully comply with the terms of the settlement agreement.

4. Until the STC's are completely transferred from J.R.G. Design, Inc. to GDC Technics, Ltd., the above-styled case is still active and, as such, the Court should not permit The Snell Law Firm, P.L.L.C. and Jason W. Snell and John Robert Skrabanek to withdraw.

WHEREFORE, PREMISES CONSIDERED GDC Technics, Ltd. prays that the Court deny The Snell Law Firm, P.L.L.C. and Jason W. Snell and John Robert Skrabanek's Opposed Second Motion to Withdraw as Defendant's Counsel and for such other relief, whether at law or in equity, to which the Court deems it is justly entitled.

DATED this 2<sup>nd</sup> day of May, 2017.

Respectfully submitted,

RICHIE & GUERINGER, P.C.

BY: /s/ Sheldon E. Richie  
SHELDON E. RICHIE  
State Bar No. 16877000  
Email: [srichie@rg-austin.com](mailto:srichie@rg-austin.com)  
KATHERINE J. WALTERS  
State Bar No. 00785174  
Email: [kwalters@rg-austin.com](mailto:kwalters@rg-austin.com)  
100 Congress Avenue, Suite 1750  
Austin, Texas 78701  
512-236-9220 telephone  
512-236-9230 facsimile

ATTORNEY FOR PLAINTIFF  
GDC TECHNICS, LTD.

**CERTIFICATE OF SERVICE**

I hereby certify on the 2<sup>nd</sup> day of May 2017, I caused the foregoing document to be electronically filed with the Clerk of the Court pursuant to the Electronic Filing Procedures and using the CM/ECF system, and that a true and correct electronic copy was thereby caused to be served on The Snell Law Firm, P.L.L.C. and Jason W. Snell and John Robert Skrabanek.

/s/ Sheldon E. Richie

Sheldon E. Richie/Katherine J. Walters